



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10

1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

APR 16 2013

OFFICE OF
COMPLIANCE AND ENFORCEMENT

Reply To: OCE-084

CERTIFIED MAIL -- RETURN RECEIPT REQUESTED

EPA WARNING LETTER

Mr. Geoffrey Black
Branch Operations Manager
Olympic Chemical Corporation
1002 East D Street
Tacoma, Washington 98421

Re: Risk Management Program Compliance Inspection
Olympic Chemical Corporation
1002 East D Street, Tacoma, WA 98421
EPA Facility ID# 1000 0005 6468

Dear Mr. Black:

On July 13, 2011, the U.S. Environmental Protection Agency conducted an inspection of the Olympic Chemical Corporation, located at 1002 East D Street, Tacoma, Washington. The purpose of the inspection was to evaluate compliance with Section 112(r) of the Clean Air Act also known as the Risk Management Program. The RMP inspection was conducted pursuant to the authorities under Section 112(r) and Section 114 of the Clean Air Act. Listed below are the areas of concern identified by EPA:

1. **Hazard Assessment:** The Olympic Chemical Corporation facility failed to provide documentation for alternative release scenarios, a description of the scenarios identified, assumptions and parameters used, the rationale for the selection of specific scenarios and anticipated effect of the administrative controls and mitigation on the release quantity and rate be included as required by 40 C.F.R. § 68.39(b).
2. **Process Safety Information:** The Olympic Chemical Corporation facility failed to provide documentation on the evaluation of the consequences of deviations of the sulfur dioxide process in the offloading of tanker railcars into the sodium bisulfate reactor system as required by 40 C.F.R. § 68.65(c)(1)(v).

Please provide the documentation to substantiate that the areas of concern listed above have been corrected. A copy of the documents must be sent to Javier Morales, RMP Coordinator, within 14 days of your receipt of this letter. The documents may be sent via e-mail, fax or mail.

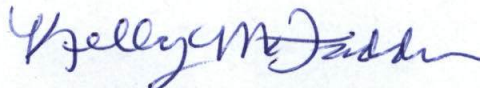
Javier Morales, RMP Coordinator
U.S. EPA Region 10
1200 Sixth Avenue, Suite 900, OCE-084
Seattle, WA 98101
Fax: (206) 553-0124

Please refer to the document *General Risk Management Program Guidance* for additional information pertaining to the areas of concern addressed above. This guidance document can be found on EPA's website at:

http://www.epa.gov/emergencies/content/rmp/rmp_guidance.htm#General

We urge you to take the steps necessary to address these concerns and to ensure that all aspects of your operation are conducted in accordance with all applicable federal, state, and local requirements. If in the future, additional violations are identified and/or corrections to the identified concerns are not made, EPA may proceed with enforcement action. If you have any questions about the inspection or the Risk Management Program, please contact Javier Morales, RMP Coordinator, at (206) 553-1255 or morales.javier@epa.gov.

Sincerely,



Kelly McFadden, Manager
Pesticides and Toxics Unit